

EXHIBIT 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al.,)	
)	
Plaintiffs,)	
)	
v.)	CASE NO. C-1-02-467
)	Judge Beckwith
AK STEEL CORPORATION,)	Magistrate Judge Hogan
)	
Defendant.)	

PLAINTIFFS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Federal Rules of Civil Procedure 26 and 34, the Plaintiffs request production of the documents listed from Defendant and its officers, attorneys, agents, contractors, and employees having any documents available to the. This Request is to be answered separately and severally by the Defendant in the manner, time and form provided by law and the rules of court, and pursuant to the Instructions and Definitions set forth in Plaintiffs' First Request for Production of Documents served on Defendant on October 17, 2002.

The Plaintiffs request that the Defendant produce and permit Plaintiffs' representatives to inspect and copy within the time provided by Rule 34 of the Federal Rules of Civil Procedure, at the offices of Plaintiffs' attorneys or at such other mutually agreed-upon place, the following documents:

1. Any and all tests administered by AK Steel or any of its agents for hourly bargaining unit candidates for employment at its Middletown, Ohio, location and at its Ashland, Kentucky, location from February 2001 until the present.

2. Any and all validation studies conducted by AK Steel or by any of its agents pursuant to the EEOC's Uniform Guidelines on Employee Selection Procedures for the tests administered by AK Steel or any of its agents for hourly bargaining unit candidates for employment at its Middletown, Ohio, location and at its Ashland, Kentucky, location from February 2001 to the present.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Susan Donahue".

Robert F. Childs, Jr. (*pro hac vice*)

Herman Nathaniel Johnson, Jr. (*pro hac vice*)

Susan Donahue (*pro hac vice*)

WIGGINS, CHILDS, QUINN & PANTAZIS, LLC

The Kress Building

301 19th Street North

Birmingham, Alabama 35203

(205) 314-0500

(205) 254-1500 (facsimile)

Paul Henry Tobias (OH bar No. 0032415)

TOBIAS, KRAUS & TORCHIA

414 Walnut Street

Suite 911

Cincinnati, Ohio 45202

(513) 241-8137

(513) 241-7863 (facsimile)

Attorneys for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2007, I served a copy of Plaintiffs' Second Request for Production of Documents via first-class U.S. Mail, postage pre-paid, upon the following:

Mr. Gregory P. Rogers
Ms. Patricia Anderson Pryor,
TAFT, STETTINIUS & HOLLISTER, LLP
425 Walnut Street, Suite 1800
Cincinnati, Ohio 45202-3957


Susan D. Mahoney
OF COUNSEL